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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
:   
v. : Hon. Zahid N. Quraishi  
:   
JAMES M. MOBLEY : Mag. No. 20-14016  
:

I, Anthony Fontana, the undersigned complainant being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Task Force Officer with the Federal Bureau of Investigation and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

\_\_\_\_\_  
s/Anthony Fontana  
Anthony Fontana, Task Force Officer  
Federal Bureau of Investigation

TFO Fontana attested to this Complaint  
by telephone pursuant to F.R.C.P. 4.1(b)(2)(A)

May 5, 2020 at 2:15 p.m.  
Date

at District of New Jersey  
County and State

HONORABLE ZAHID N. QURAISHI  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Possession of a Firearm by a Convicted Felon)

On or about February 8, 2020, in Burlington County, in the District of New Jersey and elsewhere, the defendant,

**JAMES M. MOBLEY,**

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a firearm, namely a Glock 17, 9mm caliber firearm, bearing serial number BEZK710, loaded with 10 rounds of 9mm caliber ammunition, and the firearm was in and affecting commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

**ATTACHMENT B**

I, Anthony Fontana, am a Task Force Officer with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about February 8, 2020 at approximately 6:49 p.m., law enforcement responded to a 911 call regarding a black male wearing green pants, later identified as defendant James Mobley ("MOBLEY") and a female ("Individual-1") arguing in a parking lot of a bar/lounge located in or around Burlington City, New Jersey (the "Bar").

2. Upon arrival, law enforcement officers observed MOBLEY across the street from the Bar. Law enforcement officers, driving in marked police vehicles, identified themselves and instructed MOBLEY not to run. Despite the officers' verbal commands, MOBLEY ran and crouched behind a nearby vehicle.

3. The officers exited their marked vehicles and pursued MOBLEY on foot. As one of the officers approached MOBLEY, she observed and heard a handgun hit the ground within MOBLEY's reach. An individual present in the area ("Civilian-1"), observed MOBLEY toss the handgun and yelled, "firearm, firearm!"

4. Law enforcement immediately apprehended MOBLEY and placed him under arrest. Officers also recovered the handgun, a Glock 17, 9mm caliber firearm, bearing serial number BEZK710, loaded with ten (10) rounds of 9mm caliber ammunition ("Firearm and Ammunition").

5. During searches incident to arrest, law enforcement recovered a black firearm holster hidden inside MOBLEY's waistband and an additional 9mm caliber round of ammunition inside his pocket.

6. Law enforcement also obtained security video footage from the Bar from the date and approximate time of the arrest. A review of the security video footage captured MOBLEY arguing with a female and holding a black handgun minutes before law enforcement's arrival.

7. The Firearm and Ammunition were manufactured outside the State of New Jersey and thus moved in, and affected interstate commerce prior to February 8, 2020.

8. On or about January 25, 2013, MOBLEY was convicted in the Superior Court of New Jersey, Burlington County, of possession of a controlled substance, in violation of N.J.S.A. § 2C:35-10A(1), a crime punishable by a term of imprisonment exceeding one year, for which MOBLEY was sentenced to of a term of imprisonment of five years.